

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor.

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS &
TRANSPORTATION AUTHORITY

Debtor.

PROMESA
Title III

No. 17 BK 3567-LTS

PEAJE INVESTMENT LLC,

Plaintiff,

-against-

PUERTO RICO HIGHWAYS &
TRANSPORTATION AUTHORITY, *et al.*,

Defendants.

Adv. Proc. No. 17-151-LTS in
17 BK 3567-LTS

Adv. Proc. No. 17-152-LTS in
17 BK 3283-LTS

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

TO THE HONORABLE COURT:

COMES NOW attorney Ricardo R. Lozada-Franco, who respectfully requests leave from this Court to withdraw as counsel of Peaje Investment, LLC (“Peaje”), and in support of this motion the undersigned further shows:

1. In this case, Peaje has been represented by Dechert, LLP and local counsel Monserrate Simonet & Gierbolini, LLC.

2. The undersigned respectfully submits that he longer works for Monserrate Simonet & Gierbolini, LLC. Consequently, the undersigned very respectfully requests leave from this Honorable Court to withdraw as counsel for Peaje in the case at bar.

3. Rule 1.16 (b) of the Model Rules of Professional Conduct, made applicable in this Court pursuant to Local Civil Rule 83E(a), governs an attorney's decision to decline or terminate representation. In its relevant part, it states as follows: "except as stated in paragraph (c), a lawyer may withdraw from representing a client if [. . .] withdrawal can be accomplished without material adverse effect on the interests of the client."

4. Since Peaje will continue to be represented by the law firms of Dechert, LLP and by local counsel, Monserrate Simonet & Gierbolini, LLC, the undersigned's withdrawal will have no material adverse effect on Peaje's interests.

WHEREFORE, the undersigned very respectfully requests leave from this Court to withdraw as counsel for Peaje.

I HEREBY CERTIFY: That on this date, I electronically filed the foregoing with the clerk of the Court using the CM/ECF system that will send notification of such filing to all counsel who are participant in CM/ECF system.

RESPECTFULLY SUBMITTED, in Guaynabo, Puerto Rico, this 12th day of February 2018.

/s/ Ricardo R. Lozada-Franco
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